



VIA ECF

October 28, 2022

Hon. Katharine H. Parker
U.S. District Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Bonilla et al. v. Lucero Produce II Corp. & Saul Lucero*
Docket No. 22-CV-153 (PAE) (KHP)

Dear Judge Parker:

The New York Legal Assistance Group (“NYLAG”) represents Plaintiffs in the above referenced matter. We, together with counsel for Defendants, write jointly to provide Your Honor with a status report, pursuant to the Court’s September 28, 2022 order (ECF No. 29).

Since the September 28, 2022 Settlement Conference, the Parties have engaged in meaningful settlement discussions. The Parties are mindful of the January 13, 2023 discovery deadline and contemplate possible depositions if an agreed-upon figure cannot be reached in the next week. The undersigned counsel for Plaintiffs noticed his appearance on October 14, 2022, stepping in for Plaintiffs’ prior counsel who is out on parental leave, but does not anticipate any delay in moving forward.

Thank you for your attention to this matter.

Respectfully submitted,

/s/Brian ‘Geno’ Nettle

Staff Attorney, Employment Law Project
New York Legal Assistance Group
Counsel for Plaintiffs

cc: Nicole Brenecki, Esq. (via e-mail and ECF)